

**FRIENDSHIP BROADCASTING, LLC**

January 10, 1998

Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Comments on MM Docket No. 97-234  
Implementation of 309(j) of the  
Communications Act

Dear Secretary to the FCC,

Enclosed are comments regarding this docket. Please include them in the comment file.

Cordially,



Anthony V. Bono  
Managing Partner

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JAN 25 1998

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Implementation of Section 309(j)	)	MM Docket No. <u>97-234</u>
of the Communications Act	)	
--Competitive Bidding for Commercial	)	
Broadcast and Instructional Fixed	)	
Service Licenses	)	
	)	
Reexamination of the Policy	)	GC Docket No. 92-52
Statement On Comparative	)	
Broadcast Hearings	)	
	)	
Proposals to Reform the Commission's	)	GEN Docket No. 90-264
Comparative Hearing Process to	)	
Expedite the Resolution of Cases	)	

COMMENTS OF ANTHONY V. BONO/FRIENDSHIP BROADCASTING, LLC  
JANUARY 25, 1998

Anthony V. Bono, Managing Member, Friendship Broadcasting, LLC, herewith submits comments regarding auctioning of spectrum for auxiliary services, FM translators in the commercial band and certain other matters regarding auctioning.

I believe auctions should not be implemented for mutually exclusive applications for translators in the commercial band (including the noncommercial band). Since translators are a "secondary" service it is not fair to require an auction for a service that has service limitations. A broadcaster could win a translator Construction Permit in an auction and then after a short time on the air lose the service because of interference complaints or the addition of a new primary service channel. Having a license for Secondary Service is risky because of the nature of our limited spectrum. I believe it is unfair to require auctions for this service as it places an unnecessary burden on broadcasters. Why should broadcasters pay a higher price for a translator which may or may not remain on the air. It is enough of a risk already to pay the price for equipment and installation of a translator when indeed it is a secondary service which can be "bumped".

Furthermore, in any auction situation (AM/FM/TV, etc.) only those who have filed during the application window should have the opportunity to participate in the auction. Those who show their diligence and interest (those who have done their homework) should be rewarded with the opportunity to be a part of the auction. It is unfair to open the auction to more than those who initially applied for a Construction Permit. Opening the auction reduces opportunities for smaller broadcasters. Smaller broadcasters do not have the cash availability as larger broadcasting companies. Giving anyone and everyone the opportunity to bid on a frequency just limits the opportunities for smaller broadcasters who act promptly in filing during the application window.

Allowing bidding credits to promote diversification is a good idea. It gives smaller broadcasters the opportunity to compete in auctions where they are "out classed" by larger companies. It should be a tiered system with the most credit being awarded to broadcasters with no station ownership, but previous broadcast experience. Those with one or a few stations should be given some credit as well. Also credit should be given for the following items in the application:

- 1) First Local Service
- 2) Maximum Facilities
- 3) Integration of Ownership and Management

However, I believe there should be no credits allowed for minority interest as this would show discretion for individuals rather than for their diligence and ability.

Please accept these comments and consider the points I have made.

Cordially,



Anthony V. Bono  
Friendship Broadcasting, LLC